

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**REVISED RESPONSE OF POSTAL SERVICE WITNESS MARTIN TO NATIONAL  
POSTAL MAIL HANDLERS UNION INTERROGATORY (NPMHU/USPS-T6-11)  
[ERRATA]**

The Postal Service hereby gives notice of the filing of errata to Postal Service Witness Martin's February 2, 2012, response to National Postal Mail Handlers Union Interrogatory (NPMHU/USPS-T6-11). On March 20, 2012, the Postal Service filed errata to the Direct Testimony of Cheryl Martin (USPS-T-6). On March 19, 2012, the Postal Service filed errata to library reference USPS-LR-N2012-1/11. The Postal Service is filing revisions to the above referenced interrogatory to ensure that the response conforms to these testimony and library reference revisions. Other corrections were made to the headers to the response. The attached, revised response supersedes the response filed on February 2, 2012. Revisions are highlighted in grey.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-T6-11.** Please confirm that your estimate of a 24.71% reduction in Plant-to-Plant transportation, as stated on page 9 of your testimony, is based on a projected reduction in the number of Plant-to-Plant trips, and not based on a reduction in the number of operating miles or some other figure. If not confirmed, please explain what this figure is based upon.

**RESPONSE:**

On March 20, 2012, the Postal Service filed errata to the Direct Testimony of Cheryl Martin (USPS-T-6). On March 19, 2012, the Postal Service filed errata to library reference USPS-LR-N2012-1/11. Among the changes was a revision to the estimated percent reduction in Plant-to-Plant transportation of 24.71 percent. The revised figure is 24.39 percent. With this understanding, the statement in the interrogatory is confirmed.